

**San Joaquin County & Delta Water Quality Coalition**  
3422 W. Hammer Lane, Suite A  
Stockton, California 95219  
209-472-7127 ext 125

June 27, 2007

*Via FAX 916-464-4780 3/95*  
Ms. Margie Lopez Read  
Senior Environmental Scientist  
Irrigated Lands Program  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

Re: Zone 2 Monitoring Comment Response

Dear Margie:

The following pages contain are our comments on the Regional Board's Draft of the Zone 2 monitoring data prepared by Chris Jimmensen. We applaud his attempts not to editorialize and stick with the data provided.

The comments were prepared by Dr. Michael Johnson, our Program Director, and are meant to assist you to correct assumptions made on the data that are not correct or relevant and several sections that are difficult to understand and could be edited for clarity.

We appreciate the ability to comment on this important matter. If you have any questions, please do not hesitate to contact me.

Regards,

  
John B. Meek, Jr. AFM/AAC  
Executive Director

Cc: SJCRCD Board of Directors

**San Joaquin County & Delta Water Quality Coalition**  
**Zone 2 Monitoring Comment Response**

**General Comments:**

1. The document contains the symbol for  $\mu$  which appears to be a "u". It should be changed.
2. Throughout the section there are tables such as Table Z2-2 that are compilations of the number of tests and the numbers of exceedances. A large number of the entries in the table are 0's for the exceedances. Including only those sites with exceedances would reduce the size of the table and increase the readability. Although there may be some desire to indicate the number of tests performed at each site, unless there is an explicit conclusion to be drawn from the number of tests performed and the number of exceedances found, the lengthy tables are not necessary.

**Specific comments:**

1. Page Z2-1, paragraph 1. The presentation of the pesticide data in Appendix B by total pounds is misleading since a large portion of the applications are inert compounds that should not be included. The current description suggests that for some crops in some locations, between 100-150 lbs/acre of pesticides are applied.
2. Page Z2-7, paragraph 2. The last sentence should be deleted. If the document is a review of monitoring data only, the last sentence is a statement of one course of action resulting from the review. While it may be correct, it is outside the bounds of a data review.
3. Page Z2-7, paragraph 3. Two of the three general classes of toxicants identified in the paragraph are subsets of each other. I.e., organophosphate compounds are metabolically activated compounds and metabolically activated compounds are non-Polar organics, at least as identified in a TIE analysis.
4. Page Z2-8, paragraph 1. This paragraph is not specific to Zone 2, and a majority of those tests were performed in Zone 3. The percentages of pyrethroid/chlorpyrifos associated sediment toxicity should be specific to the zone.
5. Page Z2-7, Table Z2-3 and Page Z2-8, paragraph 2. The water quality objective in the table and the paragraph should be 0.16  $\mu\text{g/L}$ , not 0.10  $\mu\text{g/L}$  (Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento-San Joaquin Delta, June 2006 Final Staff Report, pgs 25-26).
6. Page Z2-8, paragraph 3. The third sentence states that the detection of DDT/DDE could be a result of current illegal use. A review of monitoring data does not support such a conclusion. It's clear that DDT was used in the past, and the presence of DDE indicates that we are currently detecting pesticide applied decades ago. But the suggestion that DDT is a result of current illegal use is not substantiated by any evidence and the statement should be deleted.

Zone 2 Monitoring Comment Response, Page 2

7. Page Z2-16, paragraph 3. The paragraph focuses on agricultural uses of copper and the potential for these uses to be responsible for the exceedances. While applications by agriculture may be responsible for the exceedances, other sources may also contribute (e.g. brake pads) to the copper in the water bodies. This is especially true for a location such as Pixley Slough @ Eight Mile Road which is adjacent to a major road with high traffic volume. Break pad wear can be a substantial contributor of copper in surface waters as evidenced by the Break Pad Partnership which was formed in the Bay Area to address the issue because of the extreme loading of copper to the waters of SF Bay (<http://www.suscon.org/brakepad/details.asp>).
8. Page Z2-19, paragraph 1. It's not clear what this paragraph is meant to convey but it is not an interpretation of available data. It's speculation and the last sentence includes three statements of "may" which indicates there is no evidence to support any conclusions that have been drawn. The paragraph should be deleted.
9. Page Z2-19, paragraphs 5 & 6. After providing statistics on the frequency of toxic sampling events for water column toxicity, there are statements that start "although" and then provide the percentage of sites with exceedances. The statements are meant to imply that although there appears to be a very small percentage of toxic samples, there are a large percentage of toxic sites. Both or neither may be true, and the statistics should be presented without the qualification of "although." The reader should be allowed to decide on the magnitude of the percentages without subtle implications that they are large or small.

End of comments.